

ENTERED

September 30, 2024

Nathan Ochsner, Clerk

**THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:**ALEXANDER E. JONES****Debtor.**§
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§**Case No. 22-33553
(Chapter 7)**

**STIPULATION AND AGREED ORDER EXTENDING THE
DEADLINE FOR TRUSTEE TO OBJECT TO DEBTOR'S CLAIMED EXEMPTIONS**

WHEREAS, on December 2, 2022 (“**Petition Date**”), Alexander E. Jones (“**Debtor**”) filed his voluntary petition for relief under chapter 11 of the Bankruptcy Code.

WHEREAS, on June 14, 2024 (“**Conversion Date**”), the Court entered an *Order* [DE 708] converting the bankruptcy from a chapter 11 proceeding to a chapter 7 proceeding and Christopher R. Murray was duly appointed as the chapter 7 trustee (“**Trustee**”) over the Debtor’s bankruptcy estate (“**Estate**”).

WHEREAS, on June 28, 2024, the Debtor filed his *Schedules A/B, C, D, E/F, G, H, I, J, and Summary of Assets and Liabilities* [DE 749] (“**Conversion Schedules**”) along with his *Statement of Financial Affairs* [DE 750].

WHEREAS, on July 2, 2024, the 341 meeting of creditors was held and concluded.

WHEREAS, the deadline for parties to object to the exemptions claimed by the Debtor in the Conversion Schedules was August 1, 2024 (“**Original Objection Deadline**”).

WHEREAS, by *Stipulation and Agreed Order* [DE 791], the Original Objection Deadline was extended for all parties to September 2, 2024.

WHEREAS, by *Stipulation and Agreed Order* [DE 833], the Original Objection Deadline was further extended for all parties to September 30, 2024 [DE 833].

WHEREAS, the Trustee requested, and the Debtor agreed to a further extension of the Original Objection Deadline for the Trustee to respond to the Debtor's claimed exemptions (**"Trustee's Objection Deadline"**).


NOW, THEREFORE, IT IS STIPULATED AND AGREED TO BY THE PARTIES AND UPON APPROVAL BY THE COURT OF THIS STIPULATION, IT IS SO ORDERED AS FOLLOWS:

1. The above recitals are incorporated by reference herein with the same force and effect as if fully set forth hereafter.
2. The Trustee's Objection Deadline is extended to November 29, 2024.
3. This *Stipulation and Agreed Order* does not affect the current deadline for parties, other than the Trustee, including any creditors and/or parties-in-interest in this bankruptcy case (**"Non-Trustee Parties"**), to object to the exemptions claimed by the Debtor in his Conversion Schedules. The deadline for Non-Trustee Parties remains September 30, 2024 unless otherwise agreed upon by a separate agreement by and between any of the Non-Trustee Parties and the Debtor, or by Court order.
4. Nothing herein shall be construed to prohibit the Trustee, any of the Non-Trustee Parties, or the Debtor from seeking further extensions by agreement and/or by further order of the Court.
5. Notwithstanding anything in the Bankruptcy Code or the Bankruptcy Rules to the contrary, this *Stipulation and Agreed Order* shall be effective immediately upon the Court's approval.
6. The Court has exclusive jurisdiction and power regarding the implementation, interpretation, and enforcement of this *Stipulation and Agreed Order*.

Dated: September 27, 2024

IT IS SO ORDERED.

Signed: September 30, 2024



Christopher Lopez
United States Bankruptcy Judge

**AGREED AS TO FORM AND SUBSTANCE
ON SEPTEMBER 27, 2024:**

JONES MURRAY LLP <u>/s/ Jacqueline Q. Chiba</u> Jacqueline Q. Chiba Texas Bar No. 24116899 jackie@jonesmurray.com 602 Sawyer St., Suite 400 Houston, TX 77007 Tel. (832) 529-1999 Co-COUNSEL FOR THE CHAPTER 7 TRUSTEE	CROWE & DUNLEVY, P.C. <u>/s/ Christina W. Stephenson (with permission)</u> Christina W. Stephenson Texas Bar No. 24049535 crissie.stephenson@crowedunlevy.com 2525 McKinnon St., Suite 425 Dallas, TX 75201 Tel. (214) 420-2141 Co-COUNSEL FOR THE DEBTOR
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